

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

~~~~~

IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.  
Case No. 17-OP-45004

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al  
Case No. 18-OP-45132

~~~~~

Videotaped deposition of
TERRENCE M. ALLAN

December 17, 2018
9:05 a.m.

Taken at:
Tucker Ellis
950 Main Avenue, Suite 1100
Cleveland, Ohio.

Renee L. Pellegrino, RPR, CLR

1 APPEARANCES:

2 On behalf of Cuyahoga County:

Plevin & Gallucci

3 FRANK L. GALLUCCI, III, ESQ.

55 Public Square.

4 Suite 2222

Cleveland, Ohio 44113-1901

5 (216) 861-0804

fgallucci@pglawyer.com

6 - and -

Thrasher, Dinsmore & Dolan

7 LEO M. SPELLACY, JR., ESQ.

1111 Superior Avenue, Suite 412

8 Cleveland, Ohio 44114

(216) 255-5434

9 lspellacy@tddlaw.com

10 On behalf of Johnson & Johnson and Janssen
Pharmaceuticals, Inc.:

11 Tucker Ellis LLP

ERICA M. JAMES, ESQ.

12 950 Main Avenue

Suite 1100

13 Cleveland, Ohio 44113-7213

(216) 592-5000

14 erica.james@tuckerellis.com

15 On behalf of Walmart, Inc.

Jones Day

16 BRANDY H. RANJAN, ESQ.

325 John H. McConnell Boulevard

17 Suite 600

Cleveland, Ohio 43215-2673

18 (614) 469-3939

branjan@jonesday.com

19 ~ ~ ~ ~ ~
20
21
22
23
24
25

1 APPEARANCES, CONT'D:

2 On behalf of Endo Pharmaceuticals, Inc., Endo
3 Health Solutions, Inc., Par Pharmaceuticals,
Inc. and Par Pharmaceutical Companies, Inc.:

(Via Telephone)

4 Baker Hostetler

DOUGLAS A. SHIVELY, ESQ.

5 Key Tower, 127 Public Square

Cleveland, Ohio 44114-1214

6 (216) 621-0200

dshively@bakerhostetler.com

7
8 On behalf of Teva Pharmaceutical Industries:

(Via Telephone)

Morgan Lewis & Bockius LLP

9 MAUREEN K. BARBER, ESQ.

One Oxford Centre

10 Thirty Second Floor

Pittsburgh, Pennsylvania 15219-6401

11 (412) 560-7455

maureen.barber@morganlewis.com

12
13 On behalf of Cardinal Health, Inc.:

Williams & Connolly LLP

J. ANDREW KEYES, ESQ.

14 MONIKA ISIA JASIEWICZ, ESQ.

725 12th Street NW

15 Washington, D.C. 20005

(202) 434-5000

16 akeyes@cov.com

ijasiewicz@wc.com

17
18 On behalf of CVS Indiana, LLC and CVS Rx Services,
Inc.:

Zuckerman Spaeder LLP

19 DANIEL P. MOYLAN, ESQ.

100 East Pratt Street, Suite 2440

20 Baltimore, Maryland 21202-1031

(410) 949-1159

21 dmoylan@zuckerman.com

22 ~ ~ ~ ~ ~

1 APPEARANCES, CONT'D:

2 On behalf of AmerisourceBergen Drug Corporation:

(Via Telephone)

3 Reed Smith LLP

SHANA RUSSO, ESQ.

4 136 Main Street, Suite 250

Princeton Forrestal Village

5 Princeton, New Jersey 08540

(609) 987-0050

6 srusso@reedsmith.com

7

ALSO PRESENT: Joe VanDetta, Videographer

8

9

~ ~ ~ ~ ~

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TRANSCRIPT INDEX

APPEARANCES	2
INDEX OF EXHIBITS	6
INDEX OF OBJECTIONS	8
EXAMINATION OF TERRENCE M. ALLAN:	
BY MR. KEYES	15
BY MS. JAMES	284
BY MR. MOYLAN	299
AFTERNOON SESSION	157
REPORTER'S CERTIFICATE	307
EXHIBIT CUSTODY - RETAINED BY COURT REPORTER	

1 awareness. Was there awareness in 2010 that
2 prescription drug abuse and overdose was a
3 public health problem in Cuyahoga County?

4 MR. GALLUCCI: Object to form.

5 A. The report details that it was an
6 issue, but I can't speak to the scope of it, as
7 I mentioned earlier.

8 Q. I'm not asking about the scope of
9 it. Was there awareness in 2010 that
10 prescription drug abuse and overdose was a
11 public health problem in Cuyahoga County?

12 MR. GALLUCCI: Object to form.

13 A. Yes.

14 Q. In 2010 did Cuyahoga County have
15 other public health problems?

16 MR. GALLUCCI: Object to form.

17 A. Yes.

18 Q. What were they?

19 A. Well, we had longstanding issues
20 around -- in the community around -- issues
21 around inequity in health outcomes related to
22 things like chronic disease, like obesity,
23 asthma, heart disease, that have been
24 longstanding. We were responding, as noted on
25 page 11.